

BILL DATE: 1/20/98

	Non-Recurring Correct?	Port Charges Correct?	Loop Charges Correct?	Inappropriate Charges
ACCOUNT #				
(305) 828-5496	n/a	N	N	Y
(305) 673-0200	n/a	Y	Y	Y
(305) 558-9215	n/a	N	N	N
(305) 220-1377	n/a	Y	Y	Y
(305) 774-0264	n/a	N	N	Y
(305) 232-7935	n/a	N	N	Y
(305) 231-3591	n/a	Y	Y	Y
(305) 229-4209	n/a	Y	Y	Y
(305) 229-7434	n/a	Y	Y	Y
(561) 488-2973	n/a	N	N	N
(305) 512-3917	n/a	N	N	Y
(305) 387-5703	n/a	N	N	Y
(305) 651-2198	n/a	Y	N	Y
(305) 652-4464	n/a	N	N	?
(954) 680-8557	n/a	N	N	N
(407) 302-6973	N	Y	Y	Y
(305) 670-3454	n/a	N	N	?
(305) 670-9250	n/a	N	N	?
(305) 670-2330	n/a	N	N	Y
(305) 653-9301	n/a	N	N	Y
(407) 302-7241	N	Y	Y	N
(502) 244-3230	n/a	N	N	Y
(502) 244-9449	n/a	Y	N	N
(502) 292-0337	n/a	N	N	N
(502) 339-1143	n/a	N	N	N
(502) 585-4199	N	N	N	Y
(502) 585-4566	N	N	N	Y
(502) 585-5897	N	N	N	Y
(502) 633-1208	n/a	Y	N	Y

--	--	--	--	--	--

Billing Accounts	29	
Non-Recurring Correct	0.00%	
Port Correct	34.48%	
Loop Correct	24.14%	
Inappropriate Charges	65.52%	
Usage Sensitive Elements Correct*	?	* Local switching, Tandem switching & trans
Usage Sensitive Rates Correct*	?	* Cannot validate - no minutes of use or rate

LL DATE: 2/20/98

	Non-Recurring Correct?	Port Charges Correct?	Loop Charges Correct?	Inappropriate Charges
ACCOUNT #				
(305) 828-5496	n/a	Y	Y	N
(305) 673-0200	n/a	Y	Y	N
(305) 558-9215	Y	Y	Y	N
(305) 220-1377	n/a	Y	Y	N
(305) 774-0264	n/a	Y	Y	N
(305) 232-7935	n/a	Y	Y	Y
(305) 231-3591	n/a	Y	Y	N
(305) 229-4209	N	N	N	Y
(305) 229-7434	n/a	Y	Y	N
(561) 488-2973	n/a	N	N	N
(305) 512-3917	n/a	Y	Y	N
(305) 387-5703	n/a	Y	Y	N
(305) 651-2198	n/a	Y	Y	N
(305) 652-4464	n/a	Y	Y	N
(954) 680-8557	n/a	N	N	N
(407) 302-6973	N	Y	Y	N
(407) 302-7241	N	Y	Y	N
(305) 670-3454	n/a	Y	Y	N
(305) 670-9250	n/a	Y	Y	N
(305) 670-2330	n/a	N	N	N
(305) 653-9301	n/a	Y	Y	N
(502) 244-3230	n/a	N	N	Y
(502) 244-9449	n/a	Y	N	N
(502) 292-0337	n/a	N	N	N
(502) 339-1143	n/a	Y	N	N
(502) 412-0758	N	Y	N	N
(502) 412-0761	N	Y	N	N
(502) 585-4199	n/a	N	N	N

(502) 585-4566	n/a	N	N	N
(502) 585-5897	n/a	N	N	N
(502) 633-1208	n/a	Y	N	Y

Billing Accounts	31	
Non-Recurring Correct	16.67%	
Port Correct	70.97%	
Loop Correct	54.84%	
Inappropriate Charges	12.90%	
Usage Sensitive Elements Correct*	?	* Local switching, Tandem switching & trans
Usage Sensitive Rates Correct*	?	* Cannot validate - no minutes of use or rate

ILL DATE: 3/20/98

ACCOUNT #	Non-Recurring Correct?	Port Charges Correct?	Loop Charges Correct?	Inappropriate Charges
(305) 828-5496	n/a	Y	Y	N
(305) 673-0200	n/a	Y	Y	N
(305) 558-9215	n/a	Y	Y	N
(305) 220-1377	n/a	Y	Y	N
(305) 774-0264	n/a	Y	Y	Y
(305) 232-7935	n/a	Y	Y	Y
(305) 231-3591	n/a	Y	Y	N
(305) 229-4209	n/a	Y	Y	N
(305) 229-7434	n/a	Y	Y	N
(561) 488-2973	n/a	Y	N	N
(305) 512-3917	n/a	Y	Y	N
(305) 387-5703	n/a	Y	Y	N
(305) 651-2198	n/a	Y	Y	Y
(305) 652-4464	n/a	Y	Y	N
(954) 680-8557	n/a	N	N	N
(407) 302-6973	n/a	Y	Y	N
(407) 302-7241	n/a	Y	Y	N
(305) 670-3454	n/a	Y	Y	N
(305) 670-9250	n/a	Y	Y	N
(305) 670-2330	n/a	Y	Y	N
(305) 653-9301	n/a	Y	N	Y
(502) 244-3230	n/a	N	N	Y
(502) 244-9449	n/a	Y	N	N
(502) 292-0337	n/a	N	N	N
(502) 339-1143	n/a	Y	N	N
(502) 412-0758	n/a	Y	N	N
(502) 412-0761	n/a	Y	N	N

(502) 585-4199	n/a	N	N	N
(502) 585-4566	n/a	N	N	N
(502) 585-5897	n/a	N	N	N
(502) 633-1208	n/a	Y	N	Y

# Billing Accounts	31	
% Non-Recurring Correct	n/a	
% Port Correct	80.65%	
% Loop Correct	58.06%	
% Inappropriate Charges	19.35%	
% Usage Sensitive Elements Correct*	?	* Local switching, Tandem switching & trans
% Usage Sensitive Rates Correct*	?	* Cannot validate - no minutes of use or rate

BILL DATE: 4/20/98

	Non-Recurring Correct?	Port Charges Correct?	Loop Charges Correct?	Inappropriate Charges
ACCOUNT #				
(305) 828-5496	n/a	Y	Y	N
(305) 673-0200	n/a	Y	Y	N
(305) 558-9215	n/a	Y	Y	N
(305) 220-1377	n/a	Y	Y	N
(305) 774-0264	n/a	Y	Y	N
(305) 232-7935	n/a	Y	Y	Y
(305) 231-3591	n/a	Y	Y	N
(305) 229-4209	n/a	Y	Y	N
(305) 229-7434	n/a	Y	Y	N
(561) 488-2973	n/a	Y	N	N
(305) 512-3917	n/a	Y	Y	N
(305) 387-5703	n/a	Y	Y	N
(305) 651-2198	n/a	Y	Y	Y
(305) 652-4464	n/a	Y	Y	N

(954) 680-8557	n/a	N	N	N
(407) 302-6973	Disconnected			
(407) 302-7241	Disconnected			
(502) 244-3230	n/a	N	N	Y
(502) 244-9449	n/a	Y	N	N
(502) 292-0337	n/a	N	N	N
(502) 339-1143	n/a	Y	N	N
(502) 412-0758	n/a	Y	N	N
(502) 412-0761	n/a	Y	N	N
(502) 585-4199	n/a	N	N	N
(502) 585-4566	n/a	N	N	N
(502) 585-5897	n/a	N	N	N
(502) 633-1208	n/a	Y	N	Y
(305) 670-3454	n/a	Y	Y	N
(305) 670-9250	n/a	Y	Y	N
(305) 670-2330	n/a	Y	N	Y
(305) 653-9301	n/a	Y	Y	N

Billing Accounts	31	
% Non-Recurring Correct	n/a	
% Port Correct	80.65%	
% Loop Correct	58.06%	
% Inappropriate Charges	19.35%	
% Usage Sensitive Elements Correct*	?	* Local switching, Tandem switching & trans
% Usage Sensitive Rates Correct*	?	* Cannot validate - no minutes of use or rate

BILL DATE: 5/20/98

	Non-Recurring Correct?	Port Charges Correct?	Loop Charges Correct?	Inappropriate Charges
ACCOUNT #				
(305) 828-5496	n/a	Y	Y	N

(305) 673-0200	n/a	Y	Y	N
(305) 558-9215	n/a	Y	Y	N
(305) 220-1377	n/a	Y	Y	N
(305) 774-0264	n/a	Y	Y	N
(305) 232-7935	n/a	Y	Y	Y
(305) 231-3591	n/a	Y	Y	N
(305) 229-4209	n/a	Y	Y	N
(305) 229-7434	n/a	Y	Y	N
(561) 488-2973	n/a	Y	N	N
(305) 512-3917	n/a	Y	Y	N
(305) 387-5703	n/a	Y	Y	N
(305) 651-2198	n/a	Y	Y	Y
(305) 652-4464	n/a	Y	Y	N
(954) 680-8557	Disconnected			
(305) 670-3454	n/a	Y	Y	N
(305) 670-9250	n/a	Y	Y	N
(305) 670-2330	n/a	Y	N	Y
(305) 653-9301	n/a	Y	Y	N
(502) 244-3230	n/a	N	N	Y
(502) 244-9449	n/a	Y	N	N
(502) 292-0337	n/a	N	N	N
(502) 339-1143	n/a	Y	N	N
(502) 375-9736	N	Y	N	N
(502) 412-0758	n/a	Y	N	N
(502) 412-0761	n/a	Y	N	N
(502) 585-4199	n/a	N	N	N
(502) 585-4566	n/a	N	N	N
(502) 585-5897	n/a	N	N	N
(502) 633-1208	n/a	Y	N	Y

F Billing Accounts	29
% Non-Recurring Correct	0.00%
% Port Correct	79.31%
% Loop Correct	55.17%
% Inappropriate Charges	17.24%
% Usage Sensitive Elements Correct*	0.00%
% Usage Sensitive Rates Correct*	0.00%

*Did not appear on bill - cannot validate

*Did not appear on bill - cannot validate

ATTACHMENT 47

P.O. Box 290903
Nashville, TN 37229-0903
(615) 885-5798

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2 (May 12, 1998 - Volume VI A)

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1 CROSS-EXAMINATION

2 BY MR. HOPKINS:

3 Q. Mr. Putnam, my questions are going to
4 address Checklist Items 1, 2, and 14. And I hope this
5 will be done in about 15 minutes, but we'll see how it
6 goes.

7 A. Okay.

8 Q. On page 4 of your testimony you state that
9 the purpose of your testimony is to rebut
10 Mr. Bradbury's testimony; is that correct?

11 A. That is correct.

12 Q. During your review of BellSouth's OSS, did
13 you come across any evidence that contradicts any of
14 the assertions contained in Mr. Bradbury's testimony?

15 A. I think the primary assertions that are in
16 conflict here have to do with his assertions about the
17 capacity of the operating support systems.

18 Q. Do you have Mr. Bradbury's testimony?

19 A. Not in front of me, no.

20 Q. So do you know what he said about capacity?

21 A. Yes. I have reviewed it. I just don't
22 have it with me.

23 Q. And what assertions specifically do you
24 think you have evidence that contradicts his
25 assertions?

1 A. I'm sorry. Could you restate the question?

2 Q. Which specific assertions are you talking
3 about? Do you recall?

4 A. The assertions about the capacity of the
5 operating -- his assertions concerning the inadequacy
6 of the capacity of the operating support systems of
7 BellSouth.

8 Q. But that's just general. You don't have
9 any specifics; is that correct?

10 A. No, I don't have it in front of me.

11 Q. Is it true that the scope of BellSouth's
12 engagement with Ernst & Young contemplated that Ernst &
13 Young would assess nondiscriminatory access?

14 A. No. The scope is spelled out in the report
15 itself and identifies the assertions that we focused or
16 performed testing upon.

17 Q. I'm not talking about the report. I'm
18 talking about BellSouth's engagement with Ernst &
19 Young.

20 A. The report is the result of that engagement
21 and provides the scope of work that we performed.

22 MR. HOPKINS: I would like to mark --
23 and I don't know what exhibit we're on.

24 CHAIRMAN GREER: I believe the next
25 exhibit will be Exhibit 55.

1 MR. HOPKINS: Exhibit 55. And this is
2 BellSouth's response to AT&T's Production of Documents,
3 Request No. 7.

4 CHAIRMAN GREER: Are there any
5 objections?

6 MR. ROSS: No objection, but just a
7 question. Was this answer supplemented? I believe
8 this was.

9 MR. HOPKINS: I believe that we got
10 access to the work papers, but this is what was
11 provided originally.

12 CHAIRMAN GREER: Without objection, it
13 will be admitted as Exhibit No. 55.

14 (Exhibit 55 marked.)

15 BY MR. HOPKINS:

16 Q. In the second -- well, I guess the first
17 paragraph, that begins with "Ernst & Young," under No.
18 1, doesn't it state that this assessment will address
19 nondiscriminatory access?

20 A. Yes, it does.

21 Q. During your engagement did you perform any
22 comparative analysis of whether the OSS interfaces that
23 BellSouth uses for its retail operations have the same
24 functionality as what BellSouth offers to CLECs?

25 A. No, I didn't.

1 Q. And so is it true that you did not attest
2 to that BellSouth provides CLECs with nondiscriminatory
3 access?

4 A. No. The items that we issued our opinion
5 on are listed in the report.

6 Q. Now, if Ernst & Young could not attest to a
7 particular assertion made by BellSouth and that
8 assertion wasn't contained in the report, could Ernst &
9 Young still issue its strongest opinion?

10 A. Could you please restate the question?

11 Q. If BellSouth made an assertion and you
12 could not attest to that, but it wasn't included in
13 your report, could you still render your strongest
14 opinion?

15 A. Well, the opinion is limited -- let me
16 answer the question. I can't answer that one "yes" or
17 "no." Let me explain.

18 The opinion is solely -- is restricted to
19 those items that are listed in the report. So if
20 something's not in the report, we would have no opinion
21 on it.

22 Q. So you could have looked at something
23 beyond the assertions contained in the report; is that
24 correct?

25 A. We could have, yes.

1 Q. Are you familiar with the Ameritech order
2 as it relates to the persuasiveness of third-party
3 reviews?

4 A. Yes, I am.

5 Q. Particularly 216? Do you happen to have
6 that with you?

7 A. I don't have that with me.

8 MR. HOPKINS: I'd like to mark as 56
9 an excerpt from the FCC Order, Ameritech Order. And
10 I'm sorry I didn't have a clean copy, so the marginal
11 notation is my own.

12 BY MR. HOPKINS:

13 Q. Now, are you familiar with this --

14 CHAIRMAN GREER: Excuse me just a
15 minute.

16 Without objection, this will be
17 Exhibit 56.

18 (Exhibit 56 marked.)

19 BY MR. HOPKINS:

20 Q. Are you familiar with this paragraph, 216?

21 A. Yes.

22 Q. In the -- I think it's near the bottom, I
23 guess, in the last sentence of 216.

24 Isn't it true that BellSouth -- that the
25 FCC stated that third-party reviews should encompass

1 the entire obligation of the incumbent LEC to provide
2 nondiscriminatory access?

3 A. That's what the language here indicates.

4 Q. But you didn't look at nondiscriminatory
5 access; is that correct?

6 A. That's correct. And I think really the
7 helpfulness of our report is it identifies very
8 specifically the items that we did look at and the
9 performance of the operating support system that are
10 supported by the testing that we did.

11 Q. Okay. We'll get to that.

12 Isn't it true that the FCC also stated that
13 third-party reviews should consider the ability of
14 actual competing carriers in the market to conduct
15 business utilizing the incumbent's OSS access?

16 A. That's what that language states here, yes.

17 Q. Isn't it true that Ernst & Young did not
18 interview any CLECs regarding their ability to conduct
19 business utilizing BellSouth's OSS?

20 A. No, that kind of a procedure was not
21 necessary, given the assertions that we were
22 attesting -- or that we were auditing.

23 Q. So the Ernst & Young attestation would not
24 satisfy the FCC requirements stated here; is that
25 correct?

1 A. Not this language, no.

2 Q. Now, on the report itself, I believe, which
3 is Attachment 1 to your testimony, on page 1 you attest
4 to the accuracy of the assertions made on pages 2
5 through 12; is that correct?

6 A. In essence, yes.

7 Q. And on pages 2 through 9 is it true that
8 you're attesting only to whether the functionality of
9 BellSouth's CLEC OSS meet the specific FCC requirements
10 described in the detailed assertions at the top?

11 A. That is correct.

12 Q. And you're not attesting that these
13 requirements listed at the top consist of all the FCC
14 requirements relating to OSS; is that correct?

15 A. That is correct.

16 Q. And is it true that what is described as
17 FCC requirements are actually definitions of OSS
18 functions?

19 A. Yes, which is germane to what we are
20 looking at here, because much of the report is focused
21 on functionality, so what is -- what is required to be
22 performed by the various functions defined by the FCC.

23 Q. So is it true then that all you're
24 attesting to is that the functions you describe in the
25 bullet points fit within the definition of a particular

1 preordering function or a particular OSS function?

2 A. Not entirely, no. We did that. That is
3 correct. Additionally, we tested to make sure that
4 each of the assertions that are listed in the report
5 are supported by the audit testing that we performed.
6 And we also looked at the issue of operational
7 readiness and the volume testing that supported that
8 set of assertions.

9 Q. Okay. And we'll get to the operational --
10 the capacity in a moment. Let's just focus on 2
11 through -- pages 2 through 9.

12 So on these pages 2 through 9, which
13 address the functions, you're not attesting to how well
14 BellSouth's OSS perform these functions; is that
15 correct?

16 A. That is correct.

17 Q. Now, we'll talk about capacity. And that's
18 addressed on pages 10 through 12 of your report?

19 A. Yes, it is.

20 MR. HOPKINS: I'd like to mark this as
21 Exhibit No. 57. And this is the -- is entitled
22 "BellSouth ENCORE Volume Test Assessment," prepared by
23 IBM Global Services, dated May 1997. It was provided
24 in response to AT&T's first document request, Item 11.
25 ///

1 BY MR. HOPKINS:

2 Q. Are you familiar with this report,
3 Mr. Putnam?

4 CHAIRMAN GREER: Hearing no objection,
5 we'll --

6 MR. ROSS: No objection.

7 MR. HOPKINS: Oh, I'm sorry.

8 (Exhibit 57 marked.)

9 THE WITNESS: Yes, I am.

10 BY MR. HOPKINS:

11 Q. And is it true -- oh, I'm sorry. (Pause)
12 Is it true that you reviewed the IBM report
13 as part of your engagement?

14 A. That is correct.

15 Q. And is it true that one of the work items
16 that you performed was to look at the adequacy of this
17 IBM report?

18 A. Not directly, no.

19 Q. I have a work paper here, and it says
20 that --

21 MR. HOPKINS: Well, let me pass this
22 up. This will be marked as Hearing Exhibit No. 58.
23 And it's marked as confidential, but we've already
24 talked to Mr. Ellenberg about using this document, and
25 he had no problems with it.

1 CHAIRMAN GREER: Mr. Ellenberg is not
2 here to speak for himself.

3 MR. ROSS: Well, I think -- we don't
4 have any problem, certainly, using the documents. But
5 they were --

6 CHAIRMAN GREER: Proprietary?

7 MR. ROSS: Many of the work papers
8 contained CP&I information, and we produced them
9 subject to a protective agreement.

10 MR. HOPKINS: The CP&I information was
11 redacted from these documents by BellSouth before we
12 got access to them. And this has no -- I mean, we gave
13 BellSouth the heads-up on any of these documents last
14 week.

15 CHAIRMAN GREER: Without objection
16 then, it'll be admitted as Exhibit 58.

17 (Exhibit 58 marked.)

18 BY MR. HOPKINS:

19 Q. Do you recall this document?

20 A. Yes, I do.

21 Q. And isn't it true that in the bottom, in
22 the conclusion, that you state that IBM adequately
23 performed a review of the volume testing approach used
24 to validate BellSouth's CLEC interface?

25 A. Yes, it does. But I think I need to

1 explain.

2 In terms of the documents that were
3 requested by -- from Ernst & Young, they included not
4 only the work papers that supported the report, but
5 also drafts, documents of -- that were not used in
6 support of the report, correspondence with the client,
7 other items related to work that we performed that was
8 separate and apart from the work papers that supported
9 the work that we performed.

10 What that means is that there were a number
11 of documents, and it's actually about half of the 995
12 documents that were provided under the request, that
13 were extraneous to the project, that we reported upon.

14 This particular document was part of those
15 items that were not included in the actual work papers
16 that support the report. And its origin, I believe,
17 comes from earlier on in a draft of the -- or in one of
18 the things we were thinking of having as an assertion
19 to the report or BellSouth was thinking of having as an
20 assertion to the report, is assertions regarding
21 internal testing by BellSouth of its systems.

22 So we looked at -- at the potential of
23 reporting upon the IBM testing plan, and really that
24 was discarded in terms of what was included in the
25 final report. So this is -- in the film business, this

1 is one of the items that ended up on the cutting room
2 floor.

3 Q. Well, for some reason I seem to be
4 interested in this document.

5 But you did conclude in this work paper
6 that BellSouth -- this report by IBM was adequately
7 performed or prepared?

8 A. No, I -- I did not. And this work is not
9 included in work that was considered final work
10 product. So that's an inappropriate conclusion.

11 Q. In the IBM report, on page 19, isn't it
12 true that IBM concluded that BellSouth must validate
13 the assumption that 80 percent of all orders will be
14 EDI and 20 percent will be LENS?

15 A. That's identified as a recommended action
16 in the report.

17 Q. And isn't it true that the actual projected
18 orders would be approximately 84 percent LENS and 16
19 percent EDI?

20 A. I'm not sure where that comes from.

21 MR. HOPKINS: I'd like to mark this as
22 Exhibit No. 59. And this is an excerpt from one of the
23 documents received by AT&T in response to its second
24 document request from BellSouth. We went to BellSouth
25 to review the Ernst & Young work papers and had this

1 copied and provided to us.

2 BY MR. HOPKINS:

3 Q. Does this document look familiar to you?

4 A. Yes, it does.

5 Q. I'd like to draw your attention to the
6 third paragraph. Doesn't it state in the third
7 paragraph, the second sentence, that the current and
8 projected volumes are based on 84 percent LENS and 16
9 percent EDI orders?

10 A. Yes, that -- that is the basis that was
11 used for a volume projection by BellSouth.

12 Q. And based on that projection, doesn't this
13 document indicate that LENS orders will exceed tested
14 2000 order capacity by April of 1998?

15 A. Yes, it says that. But I think that's an
16 unfortunate statement. We were not in the business of
17 predicting when capacity would be -- if or when
18 capacity would be exceeded. There's a couple of issues
19 that need to play out: One, capacity is not a fixed
20 concept. Capacity can be added to over time. And,
21 also, the pattern of orders may very well change over
22 time.

23 Q. And the capacity tests that you attested to
24 used 80 percent EDI and 20 percent LENS; is that
25 correct -- rather than 84 percent LENS and 16 percent